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LONDON SILVER FIXING, LTD., ANTITRUST:

1:14-MD-02573 (VEC)

LITIGATION

1:14-MC-02573 (VEC)

This Document Relates to All Actions

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Declaration of Michael Lacovara, dated March 27, 2015 (and exhibits thereto), and upon all prior proceedings, pleadings, and papers filed herein, defendants HSBC Bank U.S.A., N.A., HSBC Holdings plc, HSBC North America Holdings Inc., HSBC USA Inc., The Bank of Nova Scotia, Scotiabanc Inc., Scotia Holdings (US) Inc., Scotia Capital (USA) Inc., Deutsche Bank AG, Deutsche Bank Americas Holding Corp., DB U.S. Financial Markets Holding Corporation, Deutsche Bank Securities Inc., Deutsche Bank Trust Corporation, Deutsche Bank Trust Company Americas, and Deutsche Bank AG New York Branch (collectively, the "Moving Defendants") hereby move this Court, before the Honorable Valerie Caproni, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and time to be determined by the Court, for an order pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing with prejudice all claims against the Moving Defendants in the Consolidated

Amended Class Action Complaint dated January 26, 2015, and for such other relief as the Court deems just and proper.

Dated: March 27, 2015

New York, New York

Respectfully submitted,

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